OhioEPA

Re: OEPA Permit No. 3IB00012*BD (B 312)

Mr. A. J. Kennedy, Plant Manager
Ashtabula Plant
The Cleveland Electric Illuminating Company
P.O. Box 5000
Cleveland, Ohio 44101

September 9, 1983

Dear Mr. Kennedy:

Please find enclosed the Compliance Sampling Inspection Report covering the CEI Ashtabula Plant survey on February 4 and 7, 1983. The report indicates that at the time of inspection this facility was in compliance with the Consent Judgment and associated draft NPDES permit entered on November 8, 1982, in the case of the State of Ohio ex rel. William J. Brown vs. the CEI Company. Additionally, we are pleased to note completion of the NPDES project at Ashtabula. We expect these innovative facilities will continue to have a significant and favorable impact on water quality of Lake Erie.

Please note the recommendations and requests included in the report.

Thank you for the courtesy extended during the inspection. Should you have any questions or comments concerning the report, please feel free to contact Marty Hilovsky at (216) 425-9171.

Yours truly,

Dennis E. Lee

Dennis E. Lee, P.E.
Group Leader
Division of Industrial Wastewater

MAH:mjo

Encl.

cc: Jack Van Kley, OAG, w/a

Northeast District Office
2110 E. Aurora Road, Twinsburg, Ohio 44087-1969 (216) 425-9171

INDUSTRIAL COMPLIANCE SAMPLING INSPECTION REPORT

The Cleveland Electric Illuminating Company
Ashtabula Plant
2133 Lake Road East
Ashtabula, Ohio 44004

Ohio EPA Permit No. 3IB00012*BD
U.S. EPA No. OH0011121

Prepared By

Martin A. Hilovsky
Environmental Scientist
Division of Wastewater
Industrial Wastewater Group
Northeast District Office
September 9, 1983

SUMMARY

On February 1, 1983, a Compliance Sampling Inspection was conducted at the Cleveland Electric Illuminating Company Ashtabula facility. The inspection was conducted by the Northeast District Office of the Ohio Environmental Protection Agency. The purpose of the inspection was to assess the company's degree of compliance with a Consent Judgement and associated draft NPDES Permit (OEPA No. 3IB00012*BD) filed in Cuyahoga County Common Pleas Court on November 8, 1982. Samples for suspended solids, total arsenic, and oil and grease were collected from monitoring stations 3IB00012002, 3IB00012004, 3IB00012006 and 3IB00012007, and were split with the permittee.

The results of the inspection indicate the facility was in compliance with the Consent Judgment and draft NPDES permit at the time of inspection. No effluent limitation violations for the above monitoring stations were found during the sampling period.

It is recommended that CEI proceed with current investigations regarding increased internal control of the regenerate process and subsequent neutralization procedures.

The company is requested to keep this office informed as to the progress of the following projects:

a. Interconnection of combined and low volume wastes basins.

b. Valving of overflows from the major basins and the coal pile runoff basin.

FACT SHEET

Permittee

The Cleveland Electric Illuminating Co.
2133 Lake Road East
Ashtabula, Ohio 44004

Facility Representative

A. J. Kennedy, Plant Manager

Tel: (216) 622-9800

Corporate Offices

The Cleveland Electric Illuminating Co.
P.O. Box 5000
Cleveland, Ohio 44101

Responsible Official

Carlton Rush
Senior Environmental Engineer

Tel: (216) 622-9800

Inspection Data

Type of Inspection:	Industrial Compliance Sampling
Date of Inspection:	February 4 and 7, 1983
Compliance Status:	In Compliance
Date of Previous Compliance Inspection:	May 20, 1982
Previous Compliance Status:	Unsatisfactory, due to schedule violations

Participants

Ohio EPA:

Martin Hilovsky, Environmental Scientist
Sandy Kausek Aho, Environmental Scientist

U.S. EPA:

David Barna, Environmental Engineer

Permittee:

A. J. Kennedy, Plant Manager
Robert Wykoff, Chemical Engineer (Corporate)
Paul Kowalski, Chemical Engineer (Plant)
Robert Parker, Environmental Engineer (Corporate)
Fred Lewis, Plant Technical Engineer (Plant)

NPDES Permit Data

Ohio EPA Permit No.:	3IB00012*BD (B 312)
U.S. EPA No.:	OH0001121
Effective Date:	January 1, 1983 (draft permit contained in Consent Judgment of 11-8-82)
Expiration Date:	Issuance of final permit

Outfall Data

Monitoring Station No.: 3IB00012001

Water Supply: Lake Erie

Wastewater Type: Non-Contact Cooling

Flow: 223.0 MGD

Receiving Waters: Lake Erie

Parameters Monitored: Flow
Temperature
Total Residual Chlorine

Monitoring Station No.: 3IB00012002

Water Supply: Lake Erie

Wastewater Type: Process and Storm Water

Flow: .253 MGD (Avg. for June, 1983)

Receiving Waters: Lake Erie

Parameters Monitored: Flow
Total Suspended Solids
Oil and Grease
Total Arsenic
pH

Monitoring Station No.: 3IB00012003

Water Supply: Lake Erie

Wastewater Type: Non-Contact Cooling

Flow: 79.0 MGD

Receiving Waters: Lake Erie

Parameters Monitored: Flow
Temperature
Total Residual Chlorine

Monitoring Station No.:	3IB00012004
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.173 MGD (Avg. for June, 1983)
Receiving Waters:	Lake Erie
Parameters Monitored:	Flow Total Suspended Solids Oil and Grease Total Arsenic pH

Monitoring Station No.:	3IB00012006
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	1.89 MGD (Avg. for June, 1983)
Receiving Waters:	Lake Erie
Parameters Monitored:	Flow Total Suspended Solids Oil and Grease Total Arsenic pH

Monitoring Station No.:	3IB00012007
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	1.035 MGD (Avg. for June, 1983)
Receiving Waters:	Lake Erie
Parameters Monitored:	Flow Total Suspended Solids Oil and Grease Total Arsenic pH

Monitoring Station No.:	3IB00012604
Water Supply:	Rainfall
Wastewater Type:	Storm Water
Flow:	.360 MGD (max.)
Receiving Waters:	Lake Erie via Outfall 002
Parameters Monitored:	Flow Total Suspended Solids Total Iron pH

Monitoring Station No.:	3IB00012605
Water Supply:	Lake Erie
Wastewater Type:	Boiler Blowdown
Flow:	8,194 GPD (Avg. for June, 1983)
Receiving Waters:	Lake Erie
Parameters Monitored:	Flow Total Suspended Solids Total Copper Total Iron pH

Monitoring Station No.:	3IB00012613
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.306 million gallons per year
Receiving Waters:	Lake Erie via Outfall 002
Parameters Monitored:	Flow Total Suspended Solids Oil and Grease Total Copper Total Iron Dissolved Iron pH

Monitoring Station No.:	3IB00012614
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.160 million gallons per year
Receiving Waters:	Lake Erie via Outfall 004
Parameters Monitored:	Flow Total Suspended Solids Oil and Grease Total Copper Total Iron Dissolved Iron pH

Monitoring Station No.:	3IB00012650
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.341 MGD (Avg. for June, 1983)
Receiving Waters:	Combined Treatment Basin (002)
Parameters Monitored:	Flow

Monitoring Station No.:	3IB00012651
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.322 MGD (Avg. for June, 1983)
Receiving Waters:	Lake Erie via combined treatment basin (002)
Parameters Monitored:	Flow

Monitoring Station No.:	3IB00012660
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.388 MGD (Avg. for June, 1983)
Receiving Waters:	Combined Treatment Basin (004)
Parameters Monitored:	Flow

Monitoring Station No.:	3IB00012661
Water Supply:	Lake Erie
Wastewater Type:	Process
Flow:	.327 MGD (Avg. for June, 1983)
Receiving Waters:	Lake Erie via combined treatment basin (004)
Parameters Monitored:	Flow

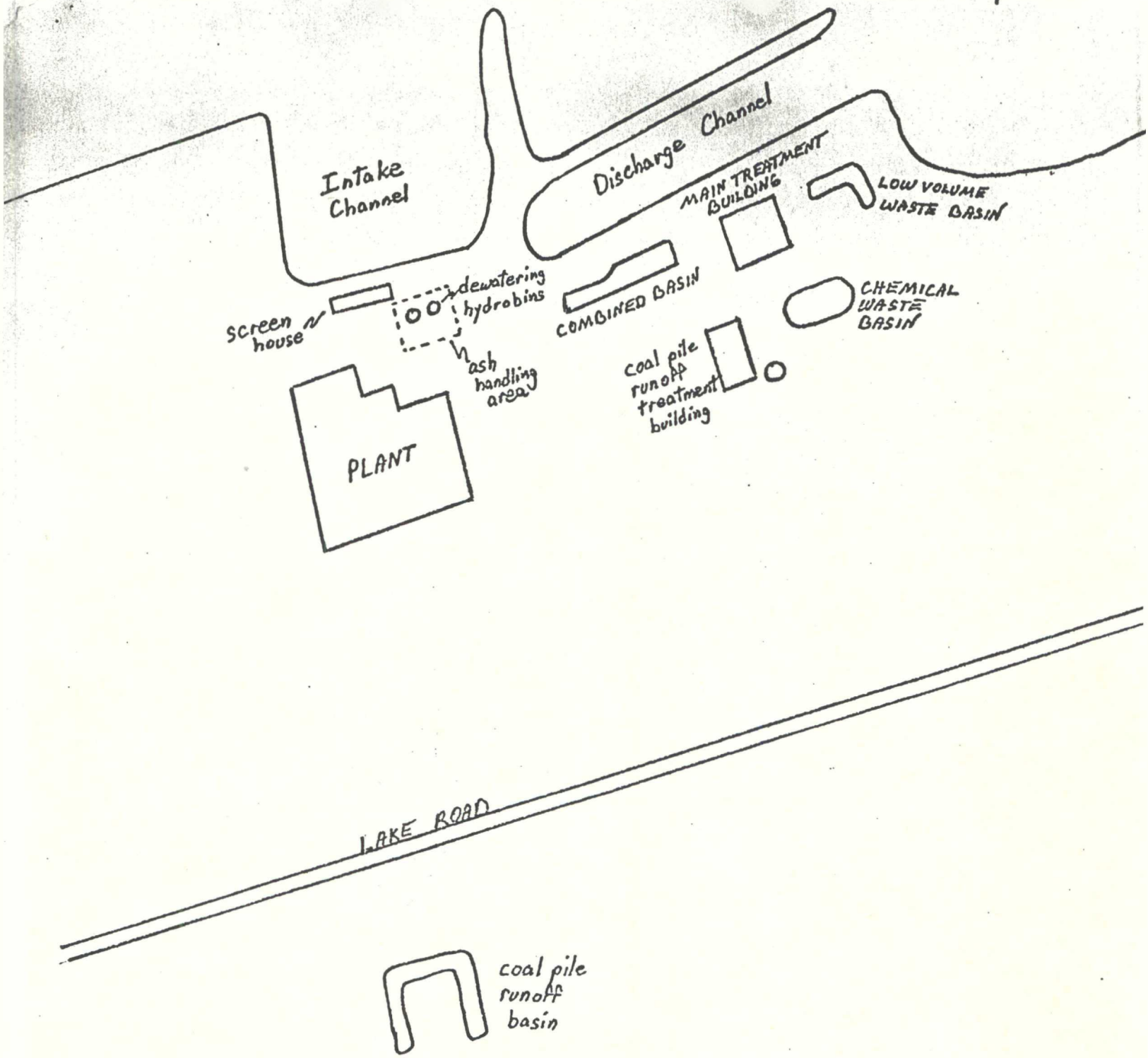
PERMITTEE PROFILE

The Cleveland Electric Illuminating Company's (CEI) Ashtabula facility (hereinafter called "Ashtabula") contains three plants: "A" Plant, "B" Plant and "C" Plant. The "A" and "B" Plants are housed together 1/4 mile west of the "C" Plant. The "A" Plant is a coal fired unit with a net demonstrated rating of 244 Mwe. "B" Plant consists of six oil fired boilers and four turbine generators with a total net demonstrated rating of 215 Mwe. "B" Plant is normally used only under peak load conditions. now retired as of 1983

The Ashtabula "C" Plant was originally owned by Union Carbide. CEI acquired the plant in 1971. In addition to electricity, the Ashtabula "C" Plant also supplies steam evaporative water and untreated water to Union Carbide. The Ashtabula "C" Plant contains four coal fired units with a net demonstrated rating of 215 Mwe.

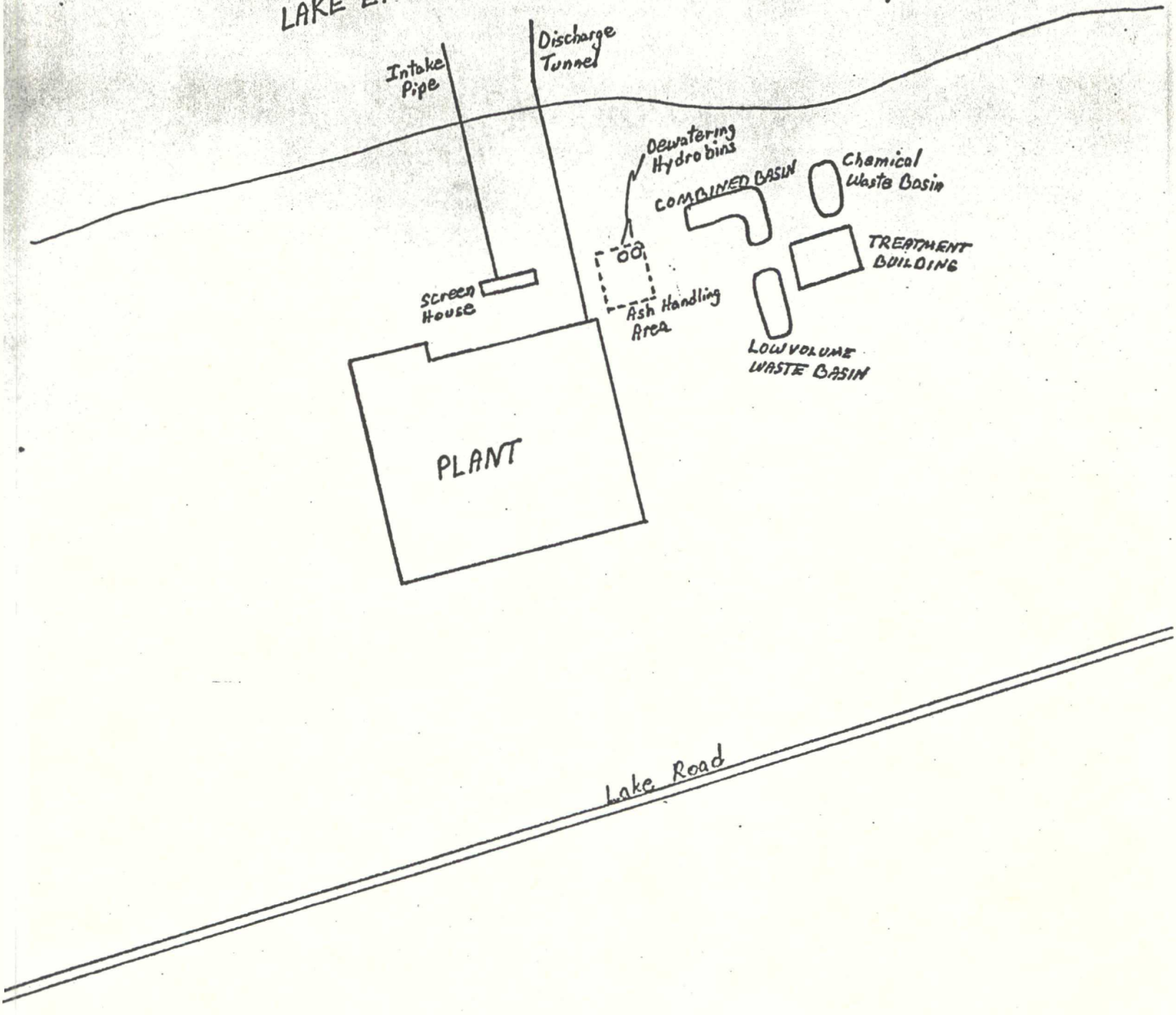
Wastewater discharges from the Ashtabula facility are regulated by NPDES Permit OEPA No. 3IB00012*BD, contained in a Consent Judgment filed in Cuyahoga County Common Pleas Court on November 8, 1982. This Consent Judgment is the result of a suit filed in February, 1981, by the Ohio Attorney General's Office because of schedule noncompliance with OEPA Findings and Orders of 1977.

Site plans for the Ashtabula facility are included on the following pages.



ASHTABULA A+B
SITE PLAN

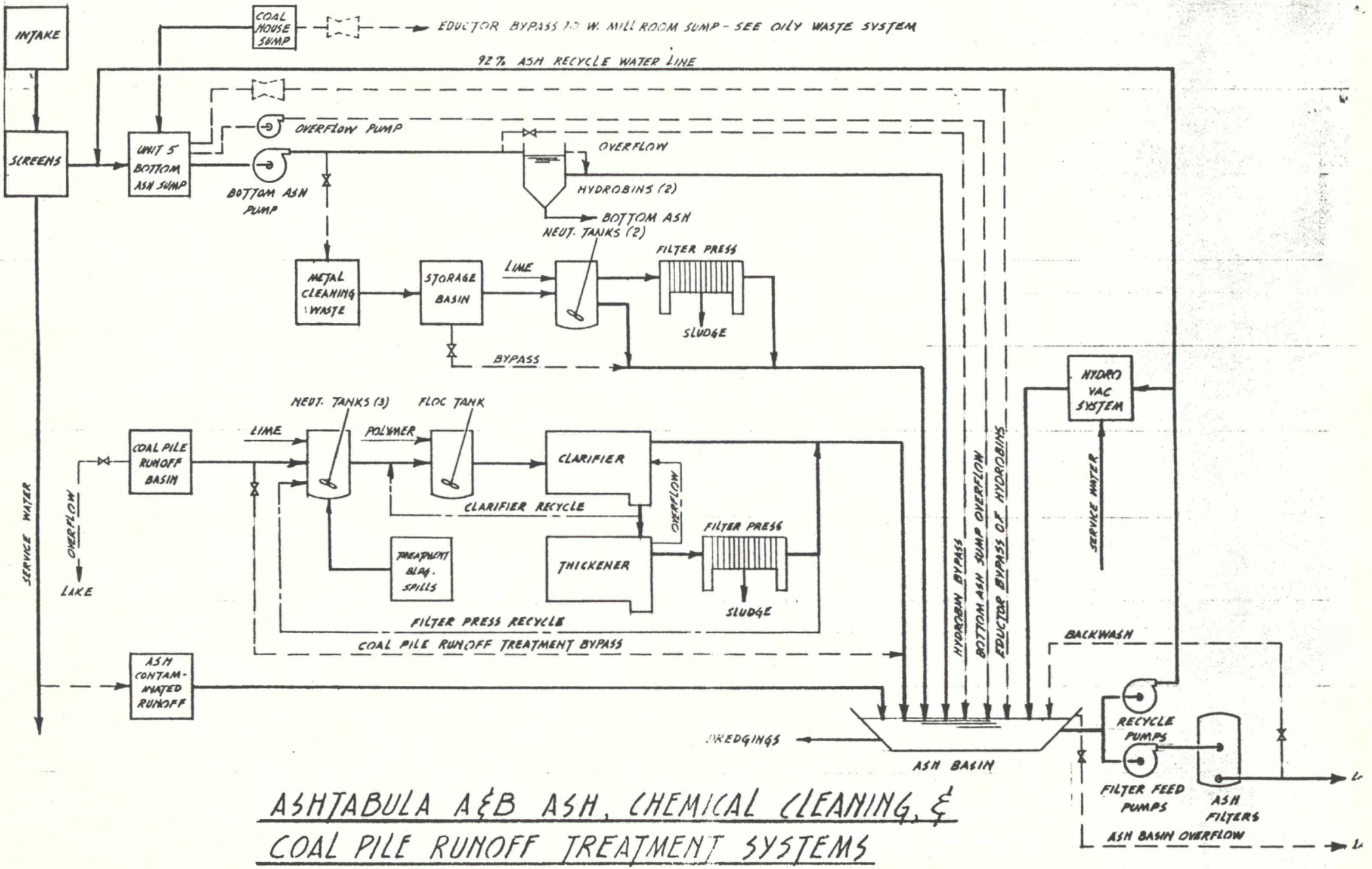
No Scale MAH 5/82



ASHTABULA C

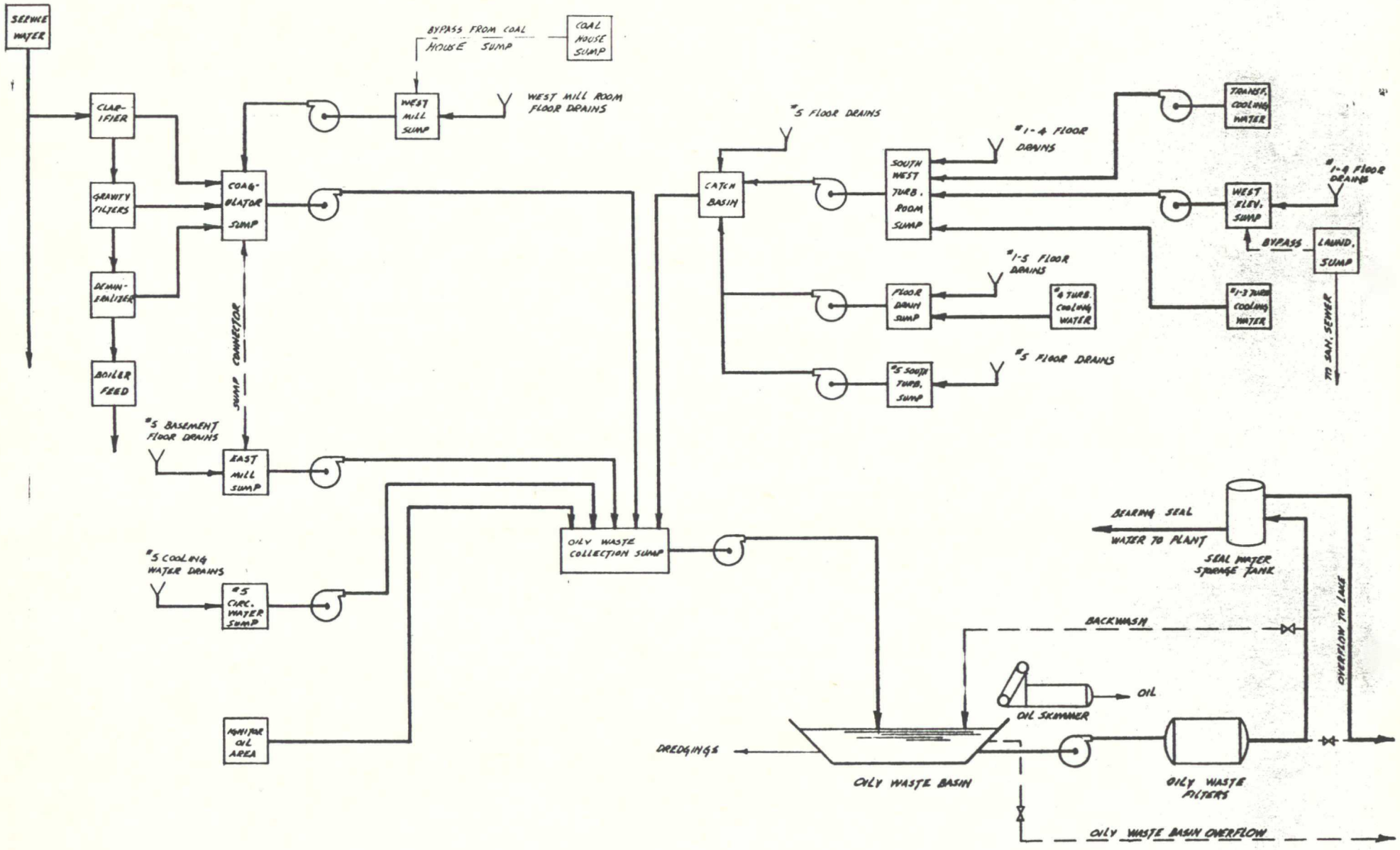
SITE PLAN

NO SCALE MAH 5/82



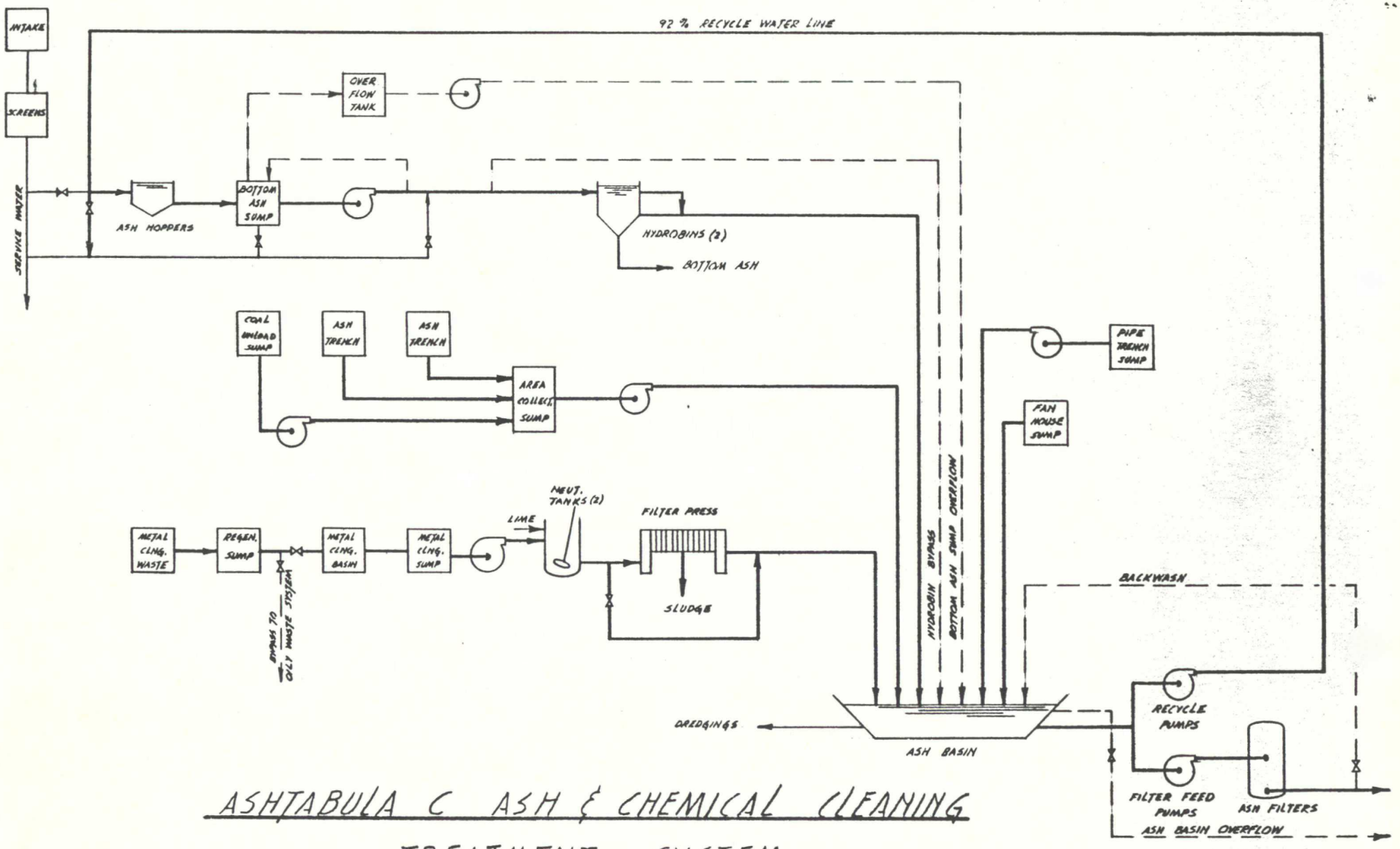
ASHTABULA A&B ASH, CHEMICAL CLEANING, & COAL PILE RUNOFF TREATMENT SYSTEMS

DRAWN : 1-21-83
BY : RLE



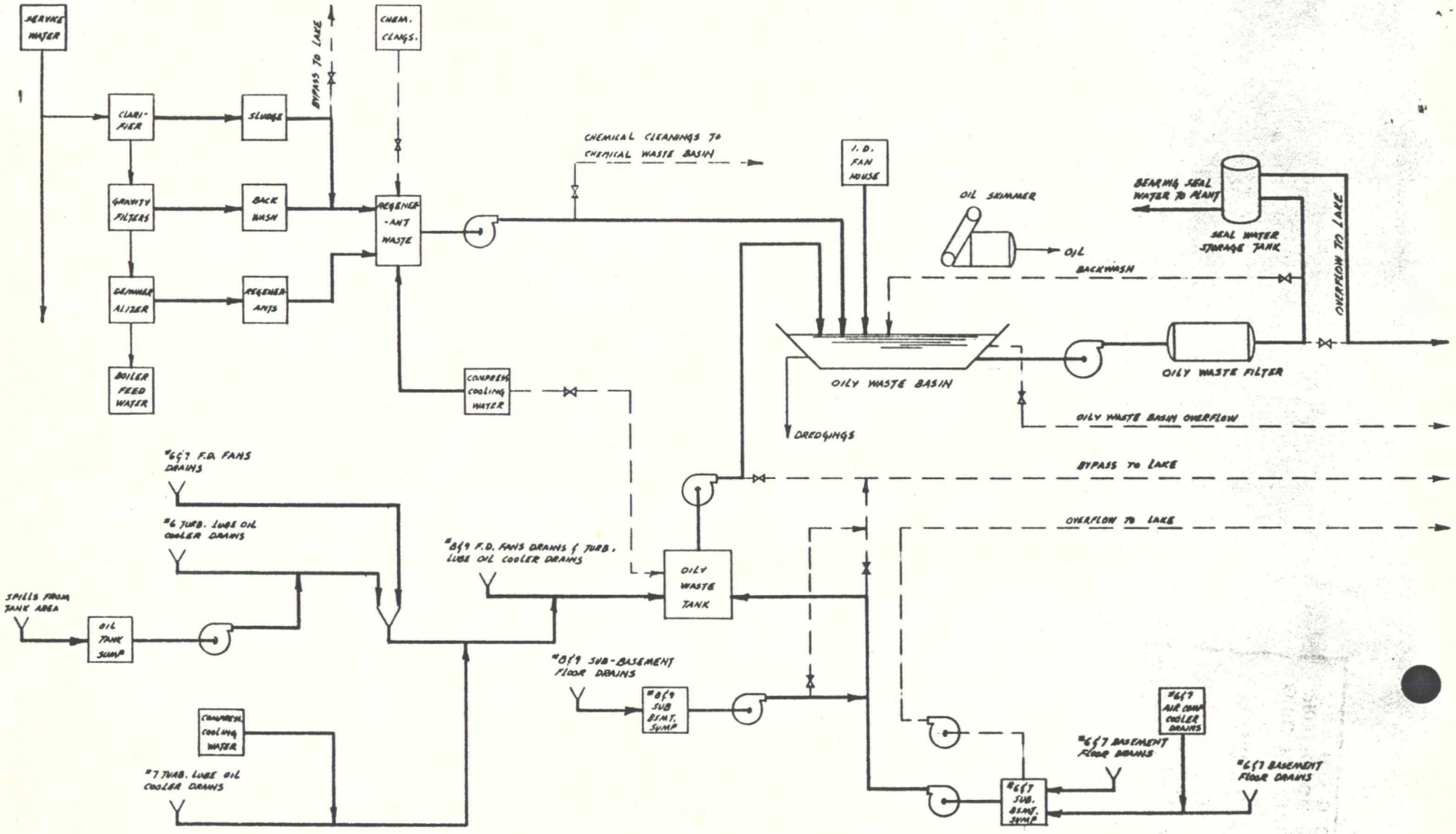
ASHTABULA A & B OILY WASTE TREATMENT SYSTEM

DRAWN: 3-1-83
BY: RLE



ASHTABULA C ASH & CHEMICAL CLEANING TREATMENT SYSTEM

DRAWN : 3-2-83
BY : RLE



ASHTABULA C OILY WASTE TREATMENT SYSTEM

DRAWN : 3-3-83
BY : RLE

WASTEWATER POLLUTION CONTROL FACILITIES

Ashtabula "A" and "B" Plants

Ashtabula "A" and "B" Plants secure their potable water from the municipal water supply at an approximate rate of .05 MGD (Department of the Army Corps of Engineers Application for a Permit to Discharge or Work in Navigable Waters and their tributaries: July 6, 1971).

Non-potable water is pumped from Lake Erie. See Table I for non-potable water usage at Ashtabula "A" and "B" Plants.

TABLE I

NON-POTABLE WATER USAGE AT "A" AND "B" PLANTS

Plant Usage	Volume (MGD)*
Cooling Water	223.00
Boiler Feed Water	.08
Process Water	9.79
Total	232.87

* Form 2C NPDES Application February, 1983.

Non-contact cooling water constitutes the majority of the non-potable water usage. The facility employes once-through cooling. Water running through the condensers of the "A" and "B" Plants ~~is~~ has been - none during 1983 chlorinated at the intake to minimize algae growth during the summer months. The condensers can be are chlorinated individually for a maximum of two hours per condenser per day. The unchlorinated circulating water from the other condensers mixes with the chlorinated water, diluting the chlorine concentration prior to discharge. Boiler blowdown is discharged directly to the lake with the condenser cooling water.

All process water generated at Ashtabula "A" and "B" is ultimately discharged to either the combined treatment basin (ash pond) or the low volume (oily waste) basin. The following is a listing and description of the major sources of wastewater entering each basin.

Combined Treatment Basin

1. Ash Transport Water - Bottom ash from the "A" Plant is slurried and pumped from ash sumps to two (2) dewatering hydrobins. Partially dewatered bottom ash is transported off site for disposal in a landfill. Overflow and decant water from these two hydrobins is pumped to the ash pond for particle settling.

   Under the present system, bottom ash transport water is being recycled from the ash pond. Approximately 92% of the water flowing from the bottom ash hydrobins (total ash transport water) is recycled back to the plant for sluice and quench water purposes.

2. Ash storage and handling runoff - Dry fly ash handling techniques are used at the "A" Plant. However, fly ash spilled during the loading of trucks is washed to a sump near the coal dumper house and is pumped to the combined treatment basin. Estimated flow to the combined treatment basin from this source is .291 MGD.

3. Chemical Cleaning Wastes - These wastes result primarily from boiler and air heater cleaning. The air heaters are normally washed once per year. The waste stream is characterized by high total suspended solids and total iron, and low pH. Each wash amounts to approximately .306 million gallons per year.

   The "A" Plant boiler is normally cleaned once every four years. The boiler water and rinses are usually high in total suspended solids, iron and copper. The acid wastes generated from cleaning the boilers are disposed of off site. The flow from this source is estimated at 2,800 gallons per year.

   Prior to discharge to the combined treatment basin, all chemical cleaning wastes are collected in a lined chemical waste lagoon. From this lagoon the wastes are pumped to the chemical treatment building where they are batch treated using lime pH adjustment, oxidation, and filtration. Filtrate is discharged to the combined treatment basin and the sludges from the filter press are hauled off site for disposal.

4. Coal Pile Runoff - Runoff from Ashtabula's coal pile is collected and routed to a retention basin. Flow from the basin is pumped to the coal pile runoff treatment system which consists of chemical

precipitation, coagulation, and ~~filtration.~~ sludge dewatering Effluent from this system is discharged to the combined treatment basin at an estimated flow of 29,000 GPD. Filter press sludge is hauled off site.

Low Volume Waste Basin

1. Regenerate Wastes - Regenerate wastes result from the regeneration of the ion exchange resins used in boiler water pretreatment. Regenerate wastes are normally caustic or acidic and amount to approximately 7,500 GPD.

2. Floor and Equipment Drains - Most of the flow from these sources is non-contact equipment cooling water. In total, floor and equipment drains account for most of the flow to the low volume waste basin.

The new chemical treatment building houses the high rate filters and filter feed pumps for both the combined and low volume waste basins. Bottom ash transport water recycle pumps are also contained in this building. Reaction tanks and a filter press for pretreatment of the chemical cleaning wastes are housed here.

Sanitary wastes have been discharged to the Ashtabula municipal sewer system since July 18, 1979.

Ashtabula "C"

Ashtabula "C" Plant secures its potable water from the municipal water supply. Non-potable water is pumped from Lake Erie. See Table II for non-potable water usage at the Ashtabula "C" Plant.

TABLE II

ASHTABULA "C" PLANT NON-POTABLE WATER USAGE

Plant Usage	Volume (MGD)*
Cooling Water	138.00
Process Water	5.40
Total	143.40

*Form 2C NPDES Application - February, 1983.

As with "A" and "B" Plants, non-contact cooling water constitutes the majority of the water usage. The facility employs once-through cooling. Condensers are not chlorinated at the "C" Plant since the water is taken from the lake bottom where algae is not a problem.

The coal pile at "A" and "B" Plants serves the "C" Plant as well. Therefore, there is no coal pile runoff at the "C" Plant.

The wastewater treatment facilities at "C" Plant are essentially the same as those serving the "A" and "B" Plants. The sources of wastewater to this system are also similar to those listed for the "A" and "B" Plants, with the exception of coal pile runoff.

Schematics of these treatment facilities are included on the following pages.

INSPECTION PROGRAM

The purpose of this survey was to assess the company's degree of compliance with the terms and conditions of November 8, 1982, Consent Judgment and its associated draft NPDES permit. The evaluation included a review of major components of the wastewater treatment system as well as sampling of process wastewater outfalls discharging at time of inspection.

Wastewater samples collected by CEI's automatic samplers at Outfalls 004, 006, and 007 were split with the permittee for solids analysis. Grab samples for oil and grease and total arsenic were also collected from these monitoring stations. Due to a sampler malfunction, a grab sample was collected at Outfall 002 for solids analysis. All samples were properly preserved and refrigerated prior to analysis.

FINDINGS

Analytical results from the February 7, 1983, sampling are included in Tables I through IV. These results indicate that the facility was in compliance with the permit effluent limitations at the time of inspection. A comparison of the analytical results from the two laboratories revealed no significant discrepancies.

Due to limited OEPA laboratory capability at the time of the survey, results are unavailable for total arsenic.

TABLE I

ANALYTICAL RESULTS OF THE COMPLIANCE SAMPLING SURVEY FOR

Cleveland Electric Illuminating - Ashtabula
February 7, 1983
3IB00012-002

PARAMETER (UNITS) NOTE	OEPA RESULTS CONC.	OEPA RESULTS LOADING (kg/da)	PERMIT LIMITS CONC.	PERMIT LIMITS LOADING (kg/da)	COMPANY RESULTS CONC.	COMPANY RESULTS LOADING (kg/da)
Flow (MGD) 1	--	--	Monitor Only		.151	--
pH (S.U.) 3	7.32	--	6.0 - 9.0		--	--
TSS (mg/l) 2,3	9.0	5.15	100 Daily Max. 30 Mo. Avg.		7.0	4.00
Oil & Grease (mg/l) 3,4	<5	--	20 Daily Max. 15 Mo. Avg.		1.5	0.18
Arsenic (ug/l)	--	--	Monitor Only		5.1	--

NOTES TO TABLE I

1. Flow was measured by company from 12:00 A.M., 2-6-83 to 12:01 A.M., 2-7-83.
2. Grab sample collected at 11:40 A.M., 2-7-83.
3. Preserved by cooling to 4°C.
4. Preserved with sulfuric acid.

TABLE II

ANALYTICAL RESULTS OF THE COMPLIANCE SAMPLING SURVEY FOR

Cleveland Electric Illuminating - Ashtabula
February 7, 1983
3IB00012-004

PARAMETER (UNITS NOTE	OEPA RESULTS		PERMIT LIMITS		COMPANY RESULTS	
	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)
Flow (MGD) 1	--	--	Monitor Only		.174	--
pH (S.U.) 3	7.51	--	6.0 - 9.0		--	--
TSS (mg/l) 2,3	<5	--	100 Daily Max. 30 Mo. Avg.		6.0	3.96
Oil & Grease (mg/l) 3,4	<5	--	20 Daily Max. 15 Mo. Avg.		<1	--
Arsenic (ug/l)	--	--	Monitor Only		2.9	--

NOTES TO TABLE II

1. Flow was measured by company from 12:00 A.M., 2-6-83 to 12:01 A.M., 2-7-83.
2. Sample collected by automatic flow proportioned sampler during the time frame noted in No. 1 above. Sample was refrigerated during compositing and split with company.
3. Preserved by cooling to 4°C.
4. Preserved with sulfuric acid.

TABLE III

ANALYTICAL RESULTS OF THE COMPLIANCE SAMPLING SURVEY FOR

Cleveland Electric Illuminating - Ashtabula
February 7, 1983
3IB00012-006

PARAMETER (UNITS) NOTE	OEPA RESULTS		PERMIT LIMITS		COMPANY RESULTS	
	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)
Flow (MGD) 1	--	--	Monitor Only		1.537	--
pH (S.U.) 3	7.49	--	6.0 - 9.0		--	--
TSS (mg/l) 2,3	16.0	93.2	100 Daily Max. 30 Mo. Avg.		21.0	122.3
Oil & Grease (mg/l) 3,4	<5	--	20 Daily Max. 15 Mo. Avg.		2.5	14.6
Arsenic (ug/l)	--	--	Monitor Only		<1.0	--

NOTES TO TABLE III

1. Flow was measured by company from 12:00 A.M., 2-6-83 to 12:01 A.M., 2-7-83.
2. Sample collected by automatic flow proportioned sampler during the time frame noted in No. 1 above. Sample was refrigerated during compositing and split with company.
3. Preserved by cooling to 4°C.
4. Preserved with sulfuric acid.

TABLE IV

ANALYTICAL RESULTS OF THE COMPLIANCE SAMPLING SURVEY FOR

Cleveland Electric Illuminating - Ashtabula
February 7, 1983
3IB00012-007

PARAMETER (UNITS) NOTE	OEPA RESULTS		PERMIT LIMITS		COMPANY RESULTS	
	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)	CONC.	LOADING (kg/da)
Flow (MGD) 1	--	--	Monitor Only		1.055	--
pH (S.U.) 3	7.99	--	6.0 - 9.0		--	--
TSS (mg/l) 2,3	10	40.0	100 Daily Max. 30 Mo. Avg.		14	56.0
Oil & Grease (mg/l) 3,4	<5	--	20 Daily Max. 15 Mo. Avg.		<1.0	--
Arsenic (ug/l)	--	--	Monitor Only		<1.0	--

NOTES TO TABLE IV

1. Flow was measured by company from 12:00 A.M., 2-6-83 to 12:01 A.M., 2-7-83.

2. Sample collected by automatic flow proportioned sampler during the time frame noted in No. 1 above. Sample was refrigerated during compositing and split with company.

3. Preserved by cooling to 4°C.

4. Preserved with sulfuric acid.

At the time of inspection, all major treatment systems were complete and operational as required by the Consent Judgment. Although Ashtabula reports no major operational problems, several design modifications are in progress. As discussed below, these modifications will allow greater process control of several individual systems.

In 1982, several CEI plants, including Ashtabula, experienced excursions from the metal cleaning waste treatment systems. As a result, Ashtabula is considering installation of a line which will enable plant personnel to recycle filter press effluent back to the system during times when effluent quality does not meet permit limitations. Such a recycle line has been installed or is in the process of being installed at other plants.

Similarly, pH excursions at the low volume waste basins (outfalls 006 and 007) during January, 1983, prompted CEI to place additional emphasis on increased internal monitoring and internal process control in the regenerate waste system. A long range objective is to have the entire regenerate process under automatic pH control.

An area of particular concern identified during this inspection and the earlier survey of May 20, 1982, is the possibility of unauthorized discharges via emergency overflow structures on the major basins. The report covering the May, 1982, inspection included a recommendation that overflows from the major basins be eliminated, or at least valved, to prevent their unintentional or automatic use in the event of an equipment malfunction. In response to this recommendation, CEI is proceeding with the engineering and installation of these valves and estimates completion in September, 1983.

A similar recommendation regarding the overflow from the coal pile runoff basin was made during the February, 1983, review. Follow-up correspondence from CEI indicates that a valve will be installed on this overflow during September, 1983.

To further reduce the possibility of unauthorized discharges, CEI is proceeding with plans to construct interconnections between the combined and low volume waste basins. These interconnections will distribute reserve filter and basin capacity in the event of equipment malfunction, and is scheduled to be completed by November, 1983.

Two other projects worthy of mention have been implemented at Ashtabula. These include:

1) CEI's central laboratory has initiated a new quality assurance program to evaluate laboratory procedures at the plant laboratories.

2) CEI has completed work on a computerized data storage and retrieval system for monthly operating reports.

CONCLUSIONS

The February 4 and 7, 1983, Compliance Sampling Inspection at CEI Ashtabula found the permittee to be in compliance with the November 8, 1982, Consent Judgment and associated draft NPDES Permit, OEPA No. 3IB00012*BD. As required by the Consent Judgment, all major treatment systems are complete and operational. A review of the company's monthly operating reports for the first five months of 1983 indicates the company is in significant compliance at all outfalls.

RECOMMENDATIONS/REQUESTS

The following recommendation and requests are submitted for CEI's evaluation and response:

1. The company should proceed with its current investigations regarding increased internal control of the regenerate process and subsequent neutralization procedures.

2. The company is requested to keep this office informed as to the progress of the following projects.

   a. Interconnection of combined and low volume wastes basins.

   b. Valving of overflows from the major basins and the coal pile runoff basin.

QUARTERLY INCOMPLIANCE REPORT

The Ohio EPA has agreed to submit to the U.S. EPA quarterly reports indicating the status compliance with NPDES permit conditions that are effective for facilities on the "Major Dischargers" list. The report also lists ongoing or proposed enforcement actions along with circumstances behind noncompliance. Thus the "Quarterly Incompliance Report" shows progress toward wastewater pollution control as well as significant deviations from required activities and effluent limitations imposed on major NPDES permit holders.

By submitting the report, the U.S. EPA is assured that we have reviewed the compliance status of all Major Dischargers on a periodic basis. The report is also available to the Congress of the United States and to the public at large. Often, copies are requested by special interest groups, sales representatives and private citizens who desire to learn the status of major facilities in their area.

Quarterly incompliance reports for CEI Ashtabula Plant for the period of April, 1982, thru March, 1983, are attached as follows.

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula NPDES NO. OH0001121 FACN 31E00012 EFFECTIVE F&C 3/14/77 MOD. EFF. _____/__/___ MOD. EFF. _____/__/___ MOD. EFF. _____/__/___ MOD. EFF. _____/__/___ MOD. EFF. _____/__/___ EXPIRES: F&C 3/13/82 TYPE: INITIAL __X__ RENEWAL _____	Effluent January Outfall 006 pH 1 significant violation 1 insignificant violation Reported: Up To 9.6 S.U. (max) Permit: 9.0 S.U. (max) Outfall 007 pH 2 significant violations Reported: 5.3 S.U. (min) 9.8 S.U. (max) Permit: 6.0 S.U. (min) 9.0 S.U. (max) February, March In Compliance Events January, February, March In Compliance	2/5/81 - Suit filed in Cuyahoga County Common Pleas Court by the Attorney General for schedule violations. 11/8/82 - Consent Judgement filed in Cuyahoga County Common Pleas Court. Significant provisions of the agreement are as follows: 1) Wastewater treatment facilities to be complete and operational on 1/1/83. 2) Starting 1/1/83, entity is required to comply with discharge limitations set forth in draft NPDES Permit contained in Consent Judgement. 2/4/83 - Joint compliance evaluation inspection conducted by district and USEPA. 2/7/83 - Compliance sampling inspection conducted by district. 3/10/83 - Enforcement letter sent to entity from district Re: January violations.	U.S. EPA and Company in 6th Circuit Court on permit issuance. 1/12,19/83 - Letters of noncompliance received from entity Re: January violations. Company reports pH excursions caused by control problems in regenerate waste system. Total pH noncompliance at Outfall 006 and 007 respectively, was about 0.7% for the month. 2/28/83 - Pursuant to the 11/8/82 Consent Judgement, stipulated penalty of $3,000 for January's significant pH violations received by Ohio Attorney General's office. 2/22/83 - Review of February MOR's indicate one pH overage which lasted less than 60 minutes in accordance with 40 CFR 401.17. Total pH overage was about 0.1% for the month.

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula NPDES NO. OH0001121 FACN 31E00012 EFFECTIVE EFF 3/14/77 MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ EXPIRES: EFF 3/13/82 TYPE: INITIAL X RENEWAL _____	Effluent October Outfall 604 Effluent not in compliance with final table, see Events. November Outfall 609 Effluent not in compliance with final table, see Events. December Outfall 604 Effluent not in compliance with final table, see Events. Events October Noncompliance Wastewater treatment facilities not operational at "C" plant by 7/1/80 and at "A" and "B" plants by 11/1/80. November, December Consent Judgement filed 11/8/82. Wastewater treatment facilities to be operational on 1/1/83.	3/14/77 - Findings and Orders issued by OEPA contains compliance schedule and effluent limitations. Significant schedule milestones are: 1) Submit plans by 12/1/76. 2) Attain operational level for sanitary wastewater by 7/1/77. 3) Initiate construction by 12/1/78. 4) Attain operational level for "C" plant facilities by 7/1/80. 5) Attain operational level for "A" and "B" plant facilities by 11/1/80. These limits apply for 5 (five) years, or until issuance of a NPDES Permit, whichever is earlier. 8/13/80 - Entity referred to the Ohio Attorney General's Office for litigation. 2/5/81 - Suit filed in Cuyahoga County Common Pleas Court by the Attorney General for schedule violations. 11/8/82 - Consent Judgement filed in Cuyahoga County Common Pleas Court. Significant provisions of the agreement are as follows: 1) Wastewater treatment facilities to be complete and operational on 1/1/83. 2) Starting 1/1/83, entity is required to comply with discharge limitations set forth in draft NPDES Permit contained in Consent Judgement. 12/7/82 - Enforcement letter sent to entity from district Re: October violations.	U.S. EPA and Company in 6th Circuit Court on permit issuance.

SUBMITTED BY: Michael A. Savage, IWW

DATE SUBMITTED: November 30, 1982

OHIO EPA
QUARTERLY NON-COMPLIANCE REPORT
REPORTING PERIOD: July, August, and September, 1982
EFFLUENT & EVENTS STATUS

DISTRICT: Northeast

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula NPDES NO. OH0001121 FACN 31P00012 EFFECTIVE FAC 3/14/77 MOD. EFF. ___/__/__ MOD. EFF. ___/__/__ MOD. EFF. ___/__/__ MOD. EFF. ___/__/__ MOD. EFF. ___/__/__ EXPIRES: FAC 3/13/82 TYPE: INITIAL X RENEWAL ___	Effluent July, August Outfall 604 Effluent not in compliance with final table, see Events. September Outfalls 002, 604 Effluent not in compliance with final table, see Events. Events July, August, September Non Compliance Wastewater treatment facilities not operational at "C" plant by 7/1/80 and a "A" and "B" plants by 11/1/80.	3/14/77 - Findings and Orders issued by OEPA contains compliance schedule and effluent limitations. Significant schedule milestones are: 1) Submit plans by 12/1/76. 2) Attain operational level for sanitary wastewater by 7/1/77. 3) Initiate construction by 12/1/78. 4) Attain operational level for "C" plant facilities by 7/1/80. 5) Attain operational level for "A" and "B" plant facilities by 11/1/80. These limits apply for 5 (five) years, or until issuance of a NPDES Permit, whichever is earlier. 8/13/80 - Entity referred to the Ohio Attorney General's Office for litigation. 2/5/81 - Suit filed in Cuyahoga County Common Pleas Court by the Attorney General for schedule violations. 9/8/82 - Enforcement letter sent to entity from district Re: July violations. 10/13/82 - Enforcement letter sent to entity from district Re: August violations. 11/8/82 - Enforcement letter sent to entity from district Re: September violations.	U.S. EPA and Company in 6th Circuit Court on permit issuance.

SUBMITTED BY: Michael A. Savage, IWW

DATE SUBMITTED: November 30, 1982

OHIO EPA
QUARTERLY NON-COMPLIANCE REPORT
REPORTING PERICD: July, August, and September, 1982
EFFLUENT & EVENTS STATUS

DISTRICT: Northeast

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula NPDES NO. OH0001121 FACN 3IP00012 EFFECTIVE FSC 3/14/77 MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ EXPIRES: FSC 3/13/82 TYPE: INITIAL X RENEWAL _____	Effluent July, August Outfall 604 Effluent not in compliance with final table, see Events. September Outfalls 002, 614 Effluent not in compliance with final table, see Events. Events July, August, September Non Compliance Wastewater treatment facilities not operational at "C" plant by 7/1/80 and a "A" and "B" plants by 11/1/80.	3/14/77 - Findings and Orders issued by OEPA contains compliance schedule and effluent limitations. Significant schedule milestones are: 1) Submit plans by 12/1/76. 2) Attain operational level for sanitary wastewater by 7/1/77. 3) Initiate construction by 12/1/78. 4) Attain operational level for "C" plant facilities by 7/1/80. 5) Attain operational level for "A" and "B" plant facilities by 11/1/80. These limits apply for 5 (five) years, or until issuance of a NPDES Permit, whichever is earlier. 8/13/80 - Entity referred to the Ohio Attorney General's Office for litigation. 2/5/81 - Suit filed in Cuyahoga County Common Pleas Court by the Attorney General for schedule violations. 9/8/82 - Enforcement letter sent to entity from district Re: July violations. 10/13/82 - Enforcement letter sent to entity from district Re: August violations. 11/8/82 - Enforcement letter sent to entity from district Re: September violations.	U.S. EPA and Company in 6th Circuit Court on permit issuance.

SUBMITTED BY: Michael A. Savage, IWW

DATE SUBMITTED: August 31, 1982

OHIO EPA
QUARTERLY NON-COMPLIANCE REPORT
REPORTING PERIOD: April, May and June, 1982
EFFLUENT & EVENTS STATUS

DISTRICT: Northeast

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula NPDES NO. OH0001121 FACN 31B00012 EFFECTIVE F&C 3/14/77 MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ MOD. EFF. __/__/__ EXPIRES: F&C 3/13/82 TYPE: INITIAL X RENEWAL ____	Effluent April Outfalls 603, 604 Effluent not in compliance with final table, see Events. May, June Outfalls 604, 609 Effluent not in compliance with final table, see Events. Events April, May, June Non Compliance Wastewater treatment facilities not operational at "C" plant by 7/1/80 and at "A" and "B" plants by 11/1/80.	3/14/77 - Findings and Orders issued by OEPA contains compliance schedule and effluent limitations. Significant schedule milestones are: 1) Submit plans by 12/1/76. 2) Attain operational level for sanitary wastewater by 7/1/77. 3) Initiate construction by 12/1/78. 4) Attain operational level for "C" plant facilities by 7/1/80. 5) Attain operational level for "A" and "B" plant facilities by 11/1/80. These limits apply for 5 (five) years, or until issuance of a NPDES Permit, whichever is earlier. 8/13/80 - Entity referred to the Ohio Attorney General's Office for litigation. 2/5/81 - Suit filed in Cuyahoga County Common Pleas Court by the Attorney General for schedule violations. 5/20/82 - Compliance evaluation inspection conducted by district. 6/11/82 - Enforcement letter sent to entity from district Re: April violations. 6/21/82 - Compliance evaluation inspection report sent to entity from district Re: 5/20/82 evaluation. Report notes entity is in noncompliance due to schedule violations. Wastewater treatment facilities are complete with the exception of coal pile runoff treatment system (Outfall	U.S. EPA and Company in 6th Circuit Court on permit issuance.

MAJOR LIST	COMPLIANCE STATUS	ACTION TAKEN OR PROPOSED	COMMENTS
NAME Cleveland Electric Illuminating - Ashtabula (Continued)		604). 7/12/82 - Enforcement letter sent to entity from district Re: May violations. 8/13/82 - Enforcement letter sent to entity from district Re: June violations.	

CODING INSTRUCTIONS

Column 1	Transaction Code - Use N, C, or D for New, Change or Delete. All inspections will be new unless there is an error in the data keypunched into WENDB.
Column 2	Card Code - Always 5 for this card.
Columns 3-11	NPDES - The NPDES permit number. (The State permit number may be accommodated in the remarks or additional spaces).
Column 12-17	Inspection Date - Entered in the year/month/day format (e.g. 77/06/30= June 30, 1977).
Column 18	Inspection Type - An inspection will fall into one of two possible categories: 'C' for Compliance Evaluation or 'S' for Compliance Sampling.
Column 19	Inspector Code - An inspection may be performed by the Region, State or NEIC (U.S. EPA National Enforcement Investigations Center). It may also be the result of a joint effort. (Credit in FPRS for a joint inspection is given to the lead agency.) Acceptable codes for WENDB are: R - EPA Regional inspections S - State inspections J - Joint EPA and State inspections - EPA lead T - Joint EPA and State inspections - State lead N - NEIC inspections
Column 20	Facility Type - This code describes the type of facility that was inspected. Acceptable codes are: 1 - Municipal - Publicly-Owned Treatment Works (POTWs) with 1972 Standard Industrial Classification (SIC) 4952. 2 - Industrial - Other than Municipal, Agricultural, and Federal facilities. 3 - Agricultural - Those facilities classified with 1972 SIC 0111-0971. 4 - Federal - Those facilities identified as Federal by EPA Regional office.
Columns 21-70	Remarks - This remarks field provides the inspector with a vehicle to store descriptive information about the inspection. There is no set format within this 50-position field. Individual Regions or States may choose to set aside portions of this field for their own specific needs.

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OMB No. 158-R0073

NPDES COMPLIANCE INSPECTION REPORT (*Coding Instructions on back of last page*)

TRANSACTION CODE (1)	(2)	NPDES (3–11)	YR MO DA (12–17)	TYPE (18)	INSPECTOR (19)	FAC TYPE (20)	TIME
N	5	OH0001121	830204	S	2	3	10[00] a.m.

REMARKS

ADDITIONAL: D 312 AO + CONSENT JUDGEMENT (+ DRAFT PERMIT) @ 11/8/82

SECTION A - Permit Summary

NAME AND ADDRESS OF FACILITY (*Include County, State and ZIP code*)		EXPIRATION DATE / ISSUANCE DATE
The Cleveland Electric Illuminating Company 2133 Lake Road Ashtabula, OH 44004 Ashtabula County		1/83 - Draft Permit
RESPONSIBLE OFFICIAL: Robert W. Wykoff	TITLE: Chemical Engineer	PHONE: (216) 622-9800
FACILITY REPRESENTATIVE: A. V. Kennedy	TITLE: Plant Manager	PHONE: (216) 622-9800

SECTION B - Effluent Characteristics (*Additional sheets attached* NO)

PARAMETER/ OUTFALL		MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				

SECTION C - Facility Evaluation (*S = Satisfactory, U = Unsatisfactory, N/A = Not applicable*)

S	EFFLUENT WITHIN PERMIT REQUIREMENTS	S	OPERATION AND MAINTENANCE	S	SAMPLING PROCEDURES
S	RECORDS AND REPORTS	S	COMPLIANCE SCHEDULE	S	LABORATORY PRACTICES
S	PERMIT VERIFICATION	S	FLOW MEASUREMENTS		OTHER:

SECTION D - Comments

SECTION E - Inspection/Review

SIGNATURES	AGENCY	DATE	ENFORCEMENT DIVISION USE ONLY
INSPECTED BY: [signature]	OEPA-NEDO	2-4-83	COMPLIANCE STATUS
INSPECTED BY: [signature] R. B[illegible]	USEPA-ED	2-4-83	☐ COMPLIANCE ☐ NONCOMPLIANCE
REVIEWED BY: [signature]	[illegible]	[illegible]	

Form Approved
OMB No. 158-R0073

PERMIT NO. 011000 1121

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☒ YES ☐ NO ☐ N/A *(Further explanation attached YES SEE REPORT)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☒ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☒ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 – Flow measurement *(Further explanation attached NO)*

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☒ YES	☐ NO	☐ N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.	☒ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☐ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☒ OTHER *(Specify Doppler, Area Velocity)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration JAN, 1983)*	☒ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☒ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☒ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☒ YES	☐ NO	☐ N/A

Part 2 – Sampling *(Further explanation attached YES, SEE REPORT)*

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☒ YES	☐ NO	☐ N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☒ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☒ AUTOMATIC COMPOSITE FREQUENCY	☒ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☒ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	☒ YES	☐ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	☒ YES	☐ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☐ YES	☐ NO	☒ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☒ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☐ YES	☒ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☐ YES	☐ NO	☒ N/A

Part 3 – Laboratory *(Further explanation attached NO)*

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☒ YES	☐ NO	☐ N/A
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☒ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☒ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. Intake Solids	☒ YES	☐ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	☒ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☒ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. 100 % OF TIME.	☒ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. 5 % OF TIME.	☒ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☐ YES	☒ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☒ N/A

LAB NAME N/A

LAB ADDRESS

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OMB No. 158 - R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO. OH0000 1121

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code)
Cleveland Electric Illuminating Co.
Box 5000
Cleveland, OH 44101 Cuyahoga

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE
5/20/82

FINDINGS
Non compliance due to schedule violation

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☒ YES ☐ NO ☐ N/A (Further explanation attached N/A)
DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	☒ YES	☐ NO	☐ N/A
(ii) ANALYSES DATES, TIMES	☒ YES	☐ NO	☐ N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	☒ YES	☐ NO	☐ N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	☒ YES	☐ NO	☐ N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	☒ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).	☒ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☒ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	☒ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	☒ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.	☐ YES	☐ NO	☒ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☒ YES ☐ NO ☐ N/A (Further explanation attached SEE REPORT)
DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☒ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☒ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☒ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☒ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☒ YES	☐ NO	☐ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☒ YES	☐ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☒ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	☒ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☒ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ YES ☐ NO ☐ N/A (Further explanation attached YES SEE REPORT)
DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	☐ YES	☐ NO	☒ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☒ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☒ YES	☐ NO	☐ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	☒ YES	☐ NO	☐ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	☒ YES	☐ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	☒ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	☒ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☒ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☒ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	☒ YES	☐ NO	☐ N/A
(l) SPCC PLAN AVAILABLE.	☒ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____)	☒ YES	☒ NO	☐ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☒ YES	☒ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☒ YES	☒ NO	☐ N/A

Form Approved
OMB No. 158-R0073

PERMIT NO. OH0000121

SECTION L - Effluent/Receiving Water Observations *(Further explanation attached NO)*

OUTFALL NO	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	None	None	None	None	None	Clear	
002	None	↓	Slight	↓	↓	↓	
003	None		None				
004	None		None				
006	None		None				
007	None	↓	Slight	↓	↓	↓	

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached YES) SEE REPORT*

- ☒ GRAB SAMPLES OBTAINED
- ☒ COMPOSITE OBTAINED
- ☒ FLOW PROPORTIONED SAMPLE
- ☒ AUTOMATIC SAMPLER USED
- ☒ SAMPLE SPLIT WITH PERMITTEE
- ☒ CHAIN OF CUSTODY EMPLOYED
- ☒ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY 25 mls every 24,000 gallons PRESERVATION HNO_3 - metals Ice - all

SAMPLE REFRIGERATED DURING COMPOSITING: ☒ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE YES

SECTION N - Analytical Results *(Attach report if necessary)*

SEE REPORT